

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

DOCKET NO. N2011-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL  
SERVICE [DBP/USPS-50 through 53]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

August 19, 2011

Respectfully submitted,

N20111H50

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-50 [a] Under what circumstances does a delivery customer of an office that is discontinued or consolidated have to file a change of address if they want to receive mail addressed to their old address?

[b] Is there a fee for filing this change of address?

[c] What happens to the mail if the customer does not file a change of address?

[d] What address correction services, such as Return Service Requested, are processed for this Change of Address?

[e] If a change of address is filed, what classes of mail are forwarded free of charge?

[f] If a change of address is filed, what classes of mail are forwarded postage due?

[g] If a change of address is filed, what classes of mail are not forwarded?

[h] Please advise how long mail will be forwarded and what happens to the mail after that time.

[i] What is the delay, if any, in the time it takes for mail that is being forwarded to be delivered to the addressee at the new address when compared to the delivery of mail that is properly addressed to the new address?

DBP/USPS-51 [a] For the 2825 post offices with low workload or revenue that are being studied for discontinuance or consolidation, approximately what percentage of their post office boxes are no fee boxes?

[b] Does the revenue foregone from these boxes count as imputed revenue for the facility?

[c] If not, why not?

DBP/USPS-52 [a] For the 2825 post offices with low workload or revenue that are being studied for discontinuance or consolidation, will the availability of alternate access be considered in the decision?

[b] If not, why not?

[c] If so, please explain how it will be taken into account including an indication of the maximum mileage a customer would have to travel to the alternate access point before it was considered excessive.

DBP/USPS-53 For each of the different categories of facilities that are being studied for discontinuance or consolidation, approximately what percentage of the transactions that take place would still be able to be transacted at each of the different types of alternate access facilities being considered. For example, the sale of 29¢ stamps at an independent post office could not be accomplished at an alternate access site that only sold Forever stamps.